

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ELIZABETH DENSON and KRISTOPHER ANTLE, Individually and on behalf of all others similarly situated, Plaintiffs, v. ELEPHANT INSURANCE SERVICES, LLC, Defendant.	Civil Action No. 3:22-cv-00022
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**CONSENT MOTION TO CLARIFY
SCOPE OF FLSA SETTLEMENT RELEASE FOR OPT-IN PLAINTIFFS**

COME NOW, Plaintiffs Elizabeth Denson and Kristopher Antle, together with Defendant Elephant Insurance Services, LLC (“Elephant”) (collectively, the “Parties”), by counsel, and hereby move the Court to enter the attached proposed Order clarifying the scope of the settlement release for the Opt-In Plaintiffs in this matter thus making clear that **the release contained in the Settlement Agreement shall only apply to time that each Opt-In Plaintiff spent as an Elephant “Sales Agent,” as reflected in the data provided by Elephant to Plaintiffs’ counsel.**

For the reasons discussed in the accompanying Memorandum the Parties respectfully request the Court grant this Motion.

WHEREFORE, the Parties respectfully request that the Court grant the Parties’ request for the aforementioned clarification to the Settlement Agreement and enter the attached proposed Order.

Date: August 17, 2022

Respectfully submitted,

<p>By: <u>/s/ Zev H. Antell</u> Harris D. Butler, III (VSB No. 26483) Craig J. Curwood (VSB No. 43975) Zev H. Antell (VSB No. 74634) BUTLER CURWOOD, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219 Telephone: (804) 648-4848 Facsimile: (804) 237-0413 Email: harris@butlercurwood.com craig@butlercurwood.com zev@butlercurwood.com</p> <p><i>Attorneys in Charge for Representative Plaintiffs and Putative Collective/Class Members</i></p>	<p><u>/s/ Lindsey A. Strachan</u> Steven D. Brown (VSB No. 42511) Lindsey A. Strachan (VSB No. 84506) Whitney E. Nelson (VSB No. 95911) Isler Dare P.C. 1111 East Main Street, Suite 1605 Richmond, Virginia 23219 Telephone: (804) 489-5500 Facsimile: (804) 234-8234 Email: sbrown@islerdare.com Email: lstrachan@islerdare.com Email: wnelson@islerdare.com</p> <p><i>Counsel for Defendant Elephant Insurance Services, LLC</i></p>
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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2022, I will electronically file the foregoing document with the Clerk of the Court, using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Zev H. Antell
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